

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

| | | |
|--|---|------------------------------|
| IN RE: |) | |
| |) | CA No. 09-11961-RGM |
| Joseph Bryce Dingman |) | |
| Debtor |) | Chapter 7 |
| <hr style="border: 0.5px solid black;"/> | | |
| Audrey Winter |) | Adv. No. 09-01165-RGM |
| |) | |
| Plaintiff |) | |
| |) | |
| v. |) | |
| Joseph Bryce Dingman |) | |
| |) | |
| Defendant |) | |
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DEFENDANT'S INITIAL DISCLOSURES

TO: Andrew L. Cole, Esquire
Franklin & Prokopik, PC
The B&O Building
Two N. Charles St., STE 600
Baltimore, MD 21201
Counsel for Plaintiff Audrey Winter

COMES NOW Defendant Joseph Bryce Dingman ("Debtor" or "Defendant"), by
counsel, for his initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and
Federal Rule of Bankruptcy Procedure 7026, states as follows:

Thomas M. Dunlap VSB #44016
David Ludwig VSB #73157
DUNLAP, GRUBB & WEAVER PLLC
199 Liberty Street SW
Leesburg, Virginia 20175-2715
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dludwig@dglegal.com
Counsel for Plaintiffs Frank M. and Kay S. Puckett

(i) Individuals Likely to Have Discoverable Information:*

1. Jennifer Church

Ms. Church was a bookkeeper for JB Contracting and can testify as to how much personal attention the Debtor paid to the company's finances.

2. Karin Bourdelais

Ms. Bourdelais was another bookkeeper for JB Contracting and can also testify to how much personal attention the Debtor paid to the company's finances.

3. Bruce Graham
43049 Battery Point Place
Leesburg VA 20176

Mr. Graham is a contractor who has worked with the Debtor and JB Contracting on various projects. He can testify to the manner in which they paid sub-contractors.

4. Ralph Anderson
39048 Piggott Bottom Road
Hamilton VA 20158

Mr. Anderson is another contractor that has worked with the Debtor and JB Contracting on various projects. He can testify to their ability to perform on the Audrey Winter project as well as the manner in which they paid their subcontractors.

5. Dustin Breedan
102 Eclipse Court Apt. 5
Martinsburg, WV 25404

* Identification of such information here is not an acknowledgment that such information is relevant or admissible in this action.

Mr. Breedan is a sales manager at Home Depot who worked with the Debtor and JB Contracting on the Winter project. He visited the site with Debtor in January to devise a lumber estimate for the project.

6. Stephanie Simms
47386 McCarthy's Island Court
Sterling, VA 21064

Ms. Simms is another bookkeeper for JB Contracting. She can testify as to when Debtor knew that JB Contracting was insolvent.

7. Casey Warden

Mr. Warden is a construction worker who worked on several construction projects with Charles Campbell and Four Seasons Renovations. He will testify as to Mr. Campbell's business practices.

8. Frank Sagido
15916 Old Waterford Road
Paeonian Springs, VA 20129

Mr. Sagido was the foreman for JB Contracting. He can testify as to the how the Debtor wound up the pending construction projects of JB Contracting once Debtor knew the business was insolvent.

9. Joseph Dingman
21659 Bronte Place
Ashburn VA 20147

Mr. Dingman is the Defendant and the current custodian of records for JB Contracting. He will not be testifying in either the discovery process or in court. He will be asserting his right not to testify against himself protected by the 5th Amendment to the U.S. Constitution.

(ii) Description of Documents That Plaintiffs May Use To Support Their Claims:*

1. All the records of JB Contracting that are currently in the possession of the Debtor.
2. There may also be categories of documents in the hands of the Plaintiff or of third parties that Debtor may use to support his claims.

(iii) Computation of Each Category of Damages Claimed by the Defendant:

Legal fees and costs charged to the Debtor from the Law firm of Dunlap, Grubb & Weaver, PLLC.

(iv) Any Insurance Agreement Under Which an Insurance Business May Be Liable To Satisfy, Indemnify, or Reimburse All or Part of a Possible Judgment:

None.

Respectfully Submitted,
JOSEPH BRYCE DINGMAN
By Counsel

Dated: August 10, 2009

/s/ Daniel L. Grubb
Daniel L. Grubb (VSB # 44119)
DUNLAP, GRUBB & WEAVER PLLC
199 Liberty Street SW
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Counsel for Defendant Joseph Bryce Dingman

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CERTIFICATE OF SERVICE

I, Daniel L. Grubb, do hereby certify that I have this the 10th day of August, 2009, sent,
via electronic mail and/or first class mail, a true and accurate copy of the foregoing to:

Andrew L. Cole, Esquire
Franklin & Prokopik, PC
The B&O Building
Two N. Charles St., STE 600
Baltimore, MD 21201
Counsel for Plaintiff Audrey Winter

/s/ Daniel L. Grubb
Daniel L. Grubb